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May 19, 2008

BY HAND

Honorable Lawrence M. McKenna
United States District Court, Southern District of New York
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MAY 19 2008

LAWRENCE M. MCKENNA
USDJ SDNY

Re: Junk v. Aon Corp., et al., No. 07-CIV-4640 (S.D.N.Y.)(LMM)(GWG)

Dear Judge McKenna:

Winston & Strawn LLP represents the defendants, Aon Corp., Aon Service Corporation and Aon Consulting, Inc. ("Defendants") in the above-referenced action.

On April 18, 2008, an order was entered directing counsel to conduct a Rule 26 conference by May 9, 2008, and to submit a discovery plan to the Court by May 19, 2008. In the event the parties are unable to submit such a plan, the Court's order instructs them to request a continuance. This letter is being submitted pursuant to the Court's order, to request a continuance of the May 19, 2008, deadline for submission of a discovery plan, pending resolution of the parties' dispute concerning the terms of a proposed plan by Magistrate Gabriel W. Gorenstein. Plaintiff's counsel, Decker, Decker, Dito & Internicola, joins in this request.

During the past few weeks, the parties have had several discussions concerning the terms of a discovery plan. These discussions began on or about April 29, 2008, when Defendants' counsel sent a proposed discovery plan to Plaintiff's counsel, and continued on April 30, 2008, May 2, 2008, May 5, 2008, May 7, 2008 and May 15, 2008. As a result of these discussions, the parties have been able to reach agreement as to all terms of the proposed discovery plan except those contemplating that discovery proceed in two phases.

In the meantime, on May 9, 2008, the Court entered an order referring all pretrial matters in the case to Magistrate Gorenstein. Shortly thereafter, on May 12, 2008, Magistrate Gorenstein entered an order directing the parties to attempt to resolve their discovery disputes and, in the event they are unable to do so, to submit a joint letter to the Court outlining their remaining disputes. Pursuant to the Magistrate's order, the parties conferred on Thursday, May 15, 2008, and are in the process of preparing a joint letter to the Magistrate. One of the issues being included in the joint letter is the parties' dispute concerning the terms of the discovery plan.

WINSTON & STRAWN LLP

Hon. Lawrence M. McKenna

May 19, 2008

Page 2

Please note that notwithstanding the parties' disagreement as to the terms of the proposed discovery plan, both sides have served their initial discovery demands. Defendants provided written responses and objections on May 5, 2008. Plaintiff's responses are due on June 9, 2008.

Accordingly, pursuant to the Court's April 18, 2008, order, the parties respectfully request a continuance of the May 19, 2008, deadline pending resolution of their dispute concerning the terms of the discovery plan by Magistrate Gorenstein.


Respectfully submitted,



Lori J. Van Auken

LVA:dc

Copy for: Charles N. Internicola, Esq. (via facsimile)

Granted. So ordered.
 *M. N.*
LSM 5/20/08